

G O D D A R D   L A W   P L L C

**MEMO ENDORSED**

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ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 10/25/2023

October 25, 2023

**VIA ECF**

The Honorable Judge Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 443  
New York, New York 10007

**Re: *Shanell Martinez v. 189 Chrystie Street Partners, LP, d/b/a The Box, et. al.***  
**Case No.: 1:22-cv-03111-VEC**

Dear Honorable Judge Caproni:

The undersigned represents Plaintiff Shannell Martinez (“Plaintiff”) in the above-referenced matter. Plaintiff writes, with Defendants’ consent, to respectfully request an adjournment of the October 26, 2023, Initial Pretrial Conference to a time and date convenient to this Court.

This adjournment is respectfully requested because Ms. Goddard is out sick and has had to cancel all commitments this week.

Counsel for the parties conferred regarding the adjournment requested herein and respectfully provide this Court with their unavailability to respectfully assist this Court with the rescheduling of the Initial Pretrial Conference. Counsel for the parties are unavailable on the following dates: October 30, 2023, November 1, 2023, November 2, 2023, November 9, 2023, November 10, 2023, November 16, 2023, November 20, 2023, November 22, 2023, November 24, 2023, and November 28, 2023.

This is Plaintiff’s second request for an adjournment of the Initial Pretrial Conference.

We thank the Court for its time and attention to this matter, its consideration of this request, and apologize for filing this request on such short notice.

Respectfully submitted,

GODDARD LAW PLLC

/s/ Megan S. Goddard

By: Megan S. Goddard, Esq.

cc: All counsel [*Via ECF*]

The conference in this matter is ADJOURNED to **Friday, November 3, 2023, at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007.

SO ORDERED.



10/25/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE